

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

NATHANIEL EARL DUNLAP

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)  
)  
)  
)

Criminal No.

(18 U.S.C. §§ 2261A(2), 1028A(a)(1) and 2)

[UNDER SEAL]

17-104

INDICTMENT

COUNT ONE

**FILED**

APR 11 2017

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

On or about December 29, 2016, in the Western District of Pennsylvania, and elsewhere, the defendant, NATHANIEL EARL DUNLAP, with intent to harass or cause substantial emotional distress to a person in another state, used an interactive computer service and a facility of interstate commerce to engage in a course of conduct that caused substantial emotional distress to that person; to wit, defendant NATHANIEL EARL DUNLAP, who resided in South Carolina, sent a harassing and threatening communication in the form of a false and fraudulent online order to Pizza Fiesta, a restaurant located in Pittsburgh, Pennsylvania, stating:

“My husband is holding me against my will. He has a gun and is threatening to kill me. I can’t call and am trying to get help. Please send help [...] Dr. in [...] township.”

(portions of address omitted), causing substantial emotional distress to an individual known to the grand jury as L.W., who resided in Pennsylvania.

In violation of Title 18, United States Code, Sections 2261A(2) and 2.

COUNT TWO

The grand jury further charges:

On or about January 15, 2017, in the Western District of Pennsylvania, and elsewhere, the defendant, NATHANIEL EARL DUNLAP, with intent to harass or cause substantial emotional distress to a person in another state, used an interactive computer service and a facility of interstate commerce to engage in a course of conduct that caused substantial emotional distress to that person; to wit, defendant NATHANIEL EARL DUNLAP, who resided in South Carolina, sent a harassing and threatening communication in the form of a false and fraudulent online order to Pizza Bellino, a restaurant located in Pittsburgh, Pennsylvania, stating:

“My husband is holding me against my will. He has a gun and is threatening to kill me. I can’t call and am trying to get help. Please send help [...] Dr. in [...] township.”

(portions of address omitted), causing substantial emotional distress to L.W., who resided in Pennsylvania.

In violation of Title 18, United States Code, Sections 2261A(2) and 2.

COUNT THREE

The grand jury further charges:

On or about February 22, 2017, in the Western District of Pennsylvania, and elsewhere, the defendant, NATHANIEL EARL DUNLAP, with intent to harass or cause substantial emotional distress to a person in another state, used an interactive computer service and a facility of interstate commerce to engage in a course of conduct that caused substantial emotional distress to that person; to wit, defendant NATHANIEL EARL DUNLAP, who resided in South Carolina, sent a harassing and threatening communication in the form of a false and fraudulent online order to Tooties Famous Italian Beef, stating:

“I was kidnapped several weeks ago on the North Side. I found access to the internet inside the house I am being held at. The address is [...] Drive. In [...]. I am being held inside the basement of this home. I need you to call 911 and send police. Dakota James”

(portions of address omitted), causing substantial emotional distress to L.W., who resided in Pennsylvania.

In violation of Title 18, United States Code, Sections 2261A(2) and 2.

COUNT FOUR

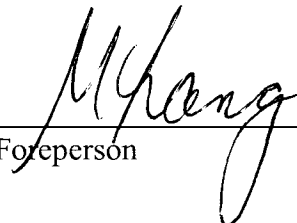
The grand jury further charges:

The allegations set forth in Counts One through Three of this Indictment are incorporated herein as if set forth in full.

On or about December 29, 2016, in the Western District of Pennsylvania, the defendant, NATHANIEL EARL DUNLAP, during and in relation to the felony violation of wire fraud, 18 U.S.C. § 1343, did knowingly and without lawful authority, possess and use a means of identification of another person, to wit, the name and address of L.W. in connection with a false and fraudulent food order.

In violation of Title 18, United States Code, Section 1028A(a)(1).

  
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SOO C. SONG  
ACTING UNITED STATES ATTORNEY  
DC ID No. 457268

  
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Foreperson